

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

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|-------------------------------|---|----------------------------|
| TIMOTHY SIMMS, |) | |
| |) | |
| Plaintiff/Judgment Creditor, |) | |
| |) | |
| vs. |) | Case No. 4:23-cv-00813-HEA |
| |) | |
| 12FIFTEEN DIAMONDS, LLC D/B/A |) | |
| DIAMOND NEXUS |) | |
| |) | |
| Defendant/Judgment Debtor. |) | |
| |) | |
| |) | |
| |) | |

GARNISHEE FOREVER COMPANIES, INC.’S MOTION TO QUASH

COMES NOW Garnishee Lautrec Corporation a/k/a Forever Companies, Inc. (“Forever”), by its attorneys, Stanton Barton LLC, and hereby moves this Court, for an Order pursuant to Fed. R. Civ. P. 69 and Missouri Supreme Court Rule 90.18 granting its Motion to Quash the Summons to Garnishee, Writ of Execution, and Interrogatories to Garnishee (collectively, the “Garnishment”) issued by Plaintiff and Judgment Creditor Timothy Simms (“Judgment Creditor”) to Forever as Garnishee. Forever incorporates herein by reference as if set forth fully herein its Memorandum in Support of Garnishee’s Motion to Quash and Declaration of Lindsey Saletta.

WHEREFORE, Garnishee Lautrec Corporation a/k/a Forever Companies, Inc. respectfully requests that the Court quash the summons to garnishee, writ of execution, and interrogatories directed to Forever and for such other and further relief as this Court deems just.

Respectfully submitted,

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*Attorneys for Garnishee, Lautrec Corporation
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 30th day of July, 2024, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon all counsel of record.

BY: /s/ Jonathan T. Barton